Law Offices of

## JAMES E. BAHAMONDE, P.C.

2501 Jody Court
North Bellmore, NY 11710
Long Island Tel. (516) 783-9662
New York City Tel. (646) 290-8258
Fax No. (646) 435-4376
James@CivilRightsNY.com

## MEMO ENDORSED

January 2, 2023

**BY ECF** 

Hon. Edgardo Ramos United States District Court Southern District of New York 500 Pearl Street, Room 1360 New York, NY 10007 The request for a second extension of time to file an application to reopen (from January 9, 2023, to February 9, 2023) is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J.
Dated: January 3, 2023
New York, New York

RE: Zayas v. 233 Ninth Corp., et al 21cv10170 (ER)(JLC)

Dear Judge Ramos:

I represent the plaintiff in the above referenced action and, with the consent of the Defendants, jointly seek an extension of time to file an application to reopen. This is the second request for an extension of time to reopen.

On November 29, 2022, the Court granted Plaintiff's motion for an extension of time to file an application to reopen. (*See*, Doc. #30). Presently, the deadline to reopen is January 9, 2023. Parties are trying to finalize the terms of the settlement agreement. However, because of the holidays and attorneys' vacation time, we respectfully request an additional 30-day extension of time to reopen. The additional time will provide parties a fair opportunity to finalize the terms of the settlement agreement.

Thank you.

Respectfully,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (via ECF) Sanjay Chaubey, Esq. Attorneys for Defendants